

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA**

**TAYLOR FREEZER SALES
CO. OF GEORGIA, INC.**

ex rel.

KYTCH, INC.,

Plaintiff,

V.

MCDONALD'S CORP.,

Defendant.

**Civil Action No. 3:23-cv-01998-TSH
in the United States District Court
for the Northern District of
California**

MOTION TO QUASH OR IN THE ALTERNATIVE FOR A PROTECTIVE ORDER

COMES NOW Taylor Freezer Sales Co. of Georgia, Inc. (“TFSG”), and moves this Honorable Court to quash (or in the alternative issue a protective order against) a non-party subpoena issued by Kytch, Inc. (“Kytch”), Plaintiff in the above-styled action, to TFSG, out of the United States District Court for the Northern District of California. TSFG submits its *Brief in Support of Motion to Quash or in the Alternative for a Protective Order* in support of the relief sought herein and incorporates the same. For the reasons set forth in its *Brief*, TSFG respectfully requests the Court quash the non-party subpoena or, alternatively, issue a protective

order conditioning compliance on the payment by Kytch of TSFG's cost and providing adequate time for TSFG to comply.

Submitted this 15th day of August, 2023.

By: **Kevin J. Tallant**

Georgia Bar No. 696690

*Attorneys for Taylor Freezer
Sales Co. of Georgia, Inc.*

TALLANT HOWELL

202 Tribble Gap Road

Suite 302

Cumming, Georgia 30040

T & F: (678) 672-1234

ktallant@tallanthowell.com

LR 5.1 CERTIFICATION

Pursuant to Local Rule 7.1(D), I certify the foregoing *Motion to Quash or in the Alternative for a Protective Order* has been prepared with one of the font and point selections approved by the Court in LR 5.1(B).

By: **Kevin J. Tallant**

Georgia Bar No. 696690

*Attorneys for Taylor Freezer
Sales Co. of Georgia, Inc.*

TALLANT HOWELL

202 Tribble Gap Road

Suite 302

Cumming, Georgia 30040

T & F: (678) 672-1234

ktallant@tallanthowell.com

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2023, I electronically filed Taylor Freezer Sales Co., of Georgia's *Brief in Support of Motion to Quash or In the Alternative for a Protective Order* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Daniel P. Watkins: daniel@clarelocke.com
Jered Ede: jered@clarelocke.com

Furthermore, in the event those individuals do not receive the materials by CM/ECF, I hereby certify that I have also emailed the documents to them separately, and mailed the same to them by United States Postal Service first class mail, as follows:

Daniel P. Watkins
Jered Ede
Clare Locke, LLP
10 Prince Street
Alexandria, VA 22314

By: **Kevin J. Tallant**

Georgia Bar No. 696690
*Attorneys for Taylor Freezer
Sales Co. of Georgia, Inc.*
TALLANT HOWELL
202 Tribble Gap Road, Suite 302
Cumming, Georgia 30040
T & F: (678) 672-1234
ktallant@tallanthowell.com